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8 *Lead Counsel for Plaintiffs and the Class*

9 *[Additional Counsel on Signature Page]*

10 UNITED STATES DISTRICT COURT
11 CENTRAL DISTRICT OF CALIFORNIA

12 YAN WANG, individually and on
13 behalf of all others similarly situated,

14 Plaintiff,

15 v.

16 DADA NEXUS LIMITED, JEFF
17 HUIJIAN HE, BECK ZHAOMING
18 CHEN, LAURA MARIE BUTLER,
19 BAOHONG SUN, JIAN HAN, AND
20 JD.COM, INC.

21 Defendants.
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Case No. 2:24-cv-00239-SVW-BFM

**NOTICE OF MOTION AND
MOTION FOR FINAL APPROVAL
OF SETTLEMENT, PLAN OF
ALLOCATION, AND FINAL
CERTIFICATION OF
SETTLEMENT CLASS**

CLASS ACTION

Date: March 17, 2025

Time: 1:30 p.m.

Courtroom: 10A

Judge: Hon. Stephen V. Wilson

1 **PLEASE TAKE NOTICE** that pursuant to the Order Granting Plaintiffs’
2 Motion for Preliminary Approval of Class Action Settlement entered on November 27,
3 2024 (Dkt. 88), on March 17, 2025 at 1:30 p.m., before the Honorable Stephen V.
4 Wilson, United States District Judge for the Central District of California, 350 W. 1st
5 Street, Courtroom 10A, 10th Floor, Los Angeles, California 90012, Lead Plaintiff
6 Senthil Subramanian and named plaintiff Yan Wang (“Plaintiffs”), individually and on
7 behalf of the proposed settlement class, will and hereby do move this Court for entry
8 of an order granting final: (i) certification of the proposed Settlement Class for
9 settlement purposes only; (ii) approval of the proposed Settlement and the plan to
10 allocate the settlement proceeds; and (iii) approval of the form, manner, and content of
11 the notice of the Settlement that was delivered to the Settlement Class

12 Plaintiffs base this motion upon the: Memorandum of Points and Authorities in
13 Support of Motion for Final Approval of Settlement and Plan of Allocation, and Final
14 Certification of Settlement Class; Declaration of Jing Chen in Support of the Motions
15 for: (I) Final Approval of Settlement, Plan of Allocation, and Final Certification of
16 Settlement Class; and (II) an Award of Attorneys’ Fees and Expenses and Award to
17 Plaintiffs and all exhibits thereto; all records and papers on file in this action; and any
18 argument offered at a hearing on this motion.

19 Plaintiffs will submit a proposed Order and Final Judgment granting the
20 requested relief with their reply papers after the deadlines for submitting claims,
21 objecting to the Settlement, and requesting exclusion from the Settlement Class have
22 passed.

23 Pursuant to Local Rule 7-3, Plaintiffs have conferred with Defense Counsel who
24 do not oppose this motion.

1 Dated: February 17, 2025

THE ROSEN LAW FIRM, P.A.

2 /s/ Phillip Kim

3 Phillip Kim (*pro hac vice*)

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23 *Lead Counsel for Plaintiffs and the*
24 *Class*

CERTIFICATE OF SERVICE

I, Phillip Kim, hereby declare under penalty of perjury as follows:

I am a Partner at The Rosen Law Firm, P.A., with offices at 355 South Grand Avenue, Suite 2450, Los Angeles, CA 90071. I am over the age of eighteen.

On February 17, 2025, I electronically filed the foregoing NOTICE OF MOTION AND MOTION FOR FINAL APPROVAL OF SETTLEMENT AND PLAN OF ALLOCATION, AND FINAL CERTIFICATION OF SETTLEMENT CLASS with the Clerk of the Court using the CM/ECF system which sent notification of such filing to counsel of record.

Executed on February 17, 2025.

/s/ Phillip Kim